

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA

v.

GREGORY COLBURN et al.,

Defendants

Case No. 1:19-cr-10080-NMG

DEFENDANT JOHN WILSON'S FOURTH AMENDED EXHIBIT LIST

Defendant John Wilson respectfully submits the attached list of potential exhibits to be used in Wilson's case-in-chief at trial. *See* Exhibit A. The attached list updates the amended exhibit list that Wilson submitted in ECF No. 2166 to include additional exhibits. Wilson reserves the right to introduce or use some or all of the documents listed in Exhibit A at trial based on the evidence, witnesses, and testimony at trial. By including documents on his exhibit list, Wilson does not concede and reserves his objection to the admissibility of these documents in the government's case. Wilson reserves the right to use exhibits in the exhibit lists of the government as well as other defendants who submitted exhibit lists in this matter, even if such defendants are no longer part of the trial. Wilson further reserves the right to supplement this list with notice to the government, including if the government fails to call a witness on its witness list.

Respectfully submitted,

Counsel to John Wilson,

/s/ Michael Kendall

Michael Kendall (BBO # 544866)
Lauren M. Papenhausen (BBO # 655527)
WHITE & CASE LLP
75 State Street
Boston, MA 02109-1814
(617) 979-9310
michael.kendall@whitecase.com
lauren.papenhausen@whitecase.com

Andrew E. Tomback (pro hac vice)
MCLAUGHLIN & STERN, LLP
260 Madison Avenue
New York, NY 10016
(212) 448-0066
atomback@mclaughlinstern.com

Dated: September 16, 2021

CERTIFICATE OF SERVICE

I hereby certify that a copy of the forgoing was filed electronically on September 16, 2021, and thereby delivered by electronic means to all registered participants as identified on the Notice of Electronic Filing.

/s/ Michael Kendall
Michael Kendall